# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light	)	
Company's Notice of Intent to File an	)	File No. EO-2019-0132
Application for Authority to Establish a Demand-	)	
Side Programs Investment Mechanism	)	
In the Matter of KCP&L Greater Missouri	)	
Operations Company's Notice of Intent to File an	)	File No. EO-2019-0133
Application for Authority to Establish a Demand-	)	
Side Programs Investment Mechanism	)	

## 

COMES NOW Kansas City Power & Light Company ("KCP&L"), KCP&L Greater Missouri Operations Company ("GMO") (collectively, the "Company"), Staff ("Staff") for the Missouri Public Service Commission ("Commission"), and the Office of the Public Counsel ("OPC") and, for their *Joint Motion to Amend Procedural Schedule and Consolidate Cases* ("Motion"), states as follows:

#### **Request to Consolidate Cases**

- 1. Both KCP&L and GMO have filed with the Commission tariff sheets and an application seeking approval of DSIM programs for both the KCP&L and GMO service areas. Two case numbers have resulted from these filings (EO-2019-0132 and EO-2019-0133).
- 2. Both KCP&L and GMO are owned and operated by the same entity (Evergy, Inc.). KCP&L personnel provide services to GMO. Both companies have common offices and overheads. Both companies are seeking approval to implement and/or continue substantially similar DSIM programs.
- 3. Accordingly, there are common questions of law and fact in the above-referenced cases and the consolidation of Cases Nos. EO-2019-0132 and EO-2019-0133 would be

administratively expedient in that it would simplify the filings, including discovery, to be made by all parties to these matters.

- 4. Commission Rule 4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact.
- 5. WHEREFORE, Staff and the Parties request a Commission order consolidating Cases Nos. EO-2019-0132 and EO-2019-0133 with Case No. EO-2019-0132 being the lead case.

## Request to Amend Procedural Schedule

- 6. On December 4, 2018, the Commission issued its *Order Directing Notice of Application and Order Setting Hearing* in the above-captioned dockets.
- 7. Following discussions, the Company, Staff, and OPC would like to request to modify the ordered procedural schedule as follows:

Rebuttal Testimony January 28, 2019

Surrebuttal Testimony February 5, 2019

Evidentiary Hearings February 14-15, 2019

Post-Hearing Brief February 22, 2019

Expected Order March 20, 2019

**WHEREFORE**, The Company, Staff, and OPC respectfully request that the Commission consider their Motion.

### Respectfully submitted,

# |s| Roger W. Steiner

Robert J. Hack, MBN 36496 Phone: (816) 556-2791 E-mail: <a href="mailto:rob.hack@kcpl.com">rob.hack@kcpl.com</a> Roger W. Steiner, MBN 39586

Phone: (816) 556-2314

E-mail: <a href="mailto:roger.steiner@kcpl.com">roger.steiner@kcpl.com</a>
Kansas City Power & Light Company

1200 Main – 16<sup>th</sup> Floor Kansas City, Missouri 64105

Fax: (816) 556-2787

James M. Fischer, MBN 27543 Fischer & Dority, P.C. 101 Madison Street, Suite 400 Jefferson City, MO 65101 (573) 636-6758 (Phone) (573) 636-0383 (Fax) jfischerpc@aol.com

Attorneys for Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company

## |s| Nicole Mers

Nicole Mers
Deputy Counsel
Missouri Bar No. 66766
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65012
(573) 751-6651 (Telephone)
(573) 751-9285 (Fax)
Nicole.mers@psc.mo.gov

# Attorney for Staff of the Missouri Public Service Commission

## |s| Caleb Hall

Caleb Hall Missouri Bar No. 68112 Office of Public Counsel PO Box 2230 Jefferson City, MO 65102 573-526-4975-Phone 537-751-5562-FAX Caleb.Hall@ded.mo.gov

**Attorney for the Office of the Public Counsel** 

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was served upon the parties listed below (as well as all parties to the Company's MEEIA Cycle 2 dockets, EO-2015-0240 and EO-2015-0241) on this 12<sup>th</sup> day of December 2018, by either e-mail or U.S. Mail, postage prepaid.

Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 staffcounselservice@psc.mo.gov

Office of the Public Counsel P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

s Roger W. Steiner

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